

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION CORPORATION,  Plaintiff-Applicant,  v.  BERNARD L. MADOFF INVESTMENT SECURITIES LLC,  Defendant.	Adv. Pro. No. 08-01789 (CGM)  SIPA LIQUIDATION  (Substantively Consolidated)
In re  BERNARD L. MADOFF,  Debtor.	
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,  Plaintiff,  v.  KEN-WEN FAMILY LIMITED PARTNERSHIP; KENNETH W. BROWN, in his capacity as a General Partner of the Ken-Wen Family Limited Partnership; and WENDY BROWN, in her capacity as a General Partner of the Ken-Wen Family Limited Partnership,  Defendants.	Adv. Pro. No. 10-04468 (CGM)

**DECLARATION OF CHRISTOPHER M. LAMBE IN SUPPORT OF  
TRUSTEE'S OPPOSITION TO DEFENDANT KENNETH W. BROWN'S  
MOTION AFTER JUDGMENT TO PETITION FOR REHEARING  
TO OPEN, AMEND, OR ALTER A JUDGMENT**

I, Christopher M. Lambe, declare that I am an Attorney at the firm Young Conaway  
Stargatt & Taylor, LLP, counsel to Irving H. Picard, as trustee (“Trustee”) for the substantively  
consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC  
 (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–lll, and the chapter

7 estate of Bernard L. Madoff. I submit this Declaration in support of the Trustee's Opposition to Defendant Kenneth W. Brown's motion to amend or alter the Court's *Judgment*, entered on March 15, 2022 [Docket No. 219].<sup>1</sup>

1. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the February 16, 2022 hearing before The Honorable Cecelia G. Morris in the above-captioned matter.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements are true and correct.

Dated: April 13, 2022

/s/ Christopher M. Lambe  
Christopher M. Lambe, Esq.

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<sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Trustee's Memorandum of Law in Opposition to Defendant Kenneth W. Brown's Motion After Judgment to Petition for Rehearing to Open, Amend, or Alter a Judgment, filed contemporaneously herewith.